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TWIN CITY FIRE INSURANCE COMPANY

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

BRADEN PARTNERS, LP, *et al.*,

Plaintiffs,

v.

TWIN CITY FIRE INSURANCE
COMPANY,

Defendant.

) Case No. 14-cv-01689

) Honorable Jon S. Tigar

) **REDACTED**

) **TWIN CITY FIRE INSURANCE COMPANY'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL RE: MOTION TO DISMISS**

TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

Pursuant to L.R. 7-11 and 79-5, Defendant Twin City Fire Insurance Company ("Twin City") respectfully submits this Administrative Motion to File Under Seal (the "Administrative Motion") the following: (1) portions of Twin City's Motion to Dismiss Plaintiffs Braden Partners, LP d/b/a Pacific Pulmonary Services ("Pacific Pulmonary Services") and Teijin Pharma USA, LLC's (collectively "Plaintiffs") Complaint; (2)

1 [REDACTED];
 2 (3) [REDACTED];

3 [REDACTED]; (4) Twin City's
 4 Administrative Motion; (5) the Declaration of Steven S. Son ("Son Declaration") filed in support of
 5 Twin City's Administrative Motion; (6) [REDACTED]
 6 [REDACTED]; and (7) [REDACTED].

7
 8 Twin City's Motion to Dismiss, the [REDACTED] and the [REDACTED] (which are
 9 attached as exhibits to Twin City's Motion to Dismiss), Twin City's Administrative Motion and the
 10 Son Declaration filed in support thereof, and the [REDACTED]
 11 [REDACTED]. Specifically, Twin City's Motion to Dismiss
 12 argues that the General Partners' Liability Policy Twin City issued to Braden Partners, LP under
 13 Policy No. 00 DB 0271037-11 (the "Policy") does not cover Plaintiffs' losses stemming from (1) [REDACTED]
 14 or (2) the [REDACTED]. The Motion to Dismiss [REDACTED]
 15 [REDACTED]
 16 [REDACTED]

17 Federal law requires that the [REDACTED] and the [REDACTED], and any reference to the
 18 same, must be sealed from the public record. [REDACTED]
 19 [REDACTED]
 20 [REDACTED] Similarly, [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED] Twin City was informed
 26 that [REDACTED]
 27 [REDACTED]
 28 [REDACTED]

1 [REDACTED]
2 [REDACTED]
3 Because the Motion to Dismiss, the [REDACTED] and the [REDACTED] (which are
4 attached as exhibits to Twin City's Motion to Dismiss), Twin City's Administrative Motion and the
5 Son Declaration in support thereof, and the [REDACTED]
6 [REDACTED], the Court should grant Twin City's
7 Administrative Motion. Pursuant to L.R. 79-5, Twin City will lodge full non-redacted copies of these
8 documents, and redacted versions of the documents that can be filed into the public record, if the
9 Court grants the sealing order.

10
11 Dated: June 6, 2014

KAUFMAN, DOLOWICH & VOLUCK, LLP

12
13 By: /s/ Steven S. Son

14 Dean B. Herman

15 Steven S. Son

16 Attorneys for Defendant TWIN CITY FIRE
17 INSURANCE COMPANY

18 OF COUNSEL:

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